



**IDAHO DEMOCRATIC PARTY**  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

P.O. Box 445  
Boise, ID 83701  
Phone (208) 336-1815  
Toll Free 1-800-542-4737  
FAX (208) 336-1817  
info@idaho-democrats.org  
www.idaho-democrats.org

2008 SEP 30 A 11: 01 September 3, 2008

Office of the General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

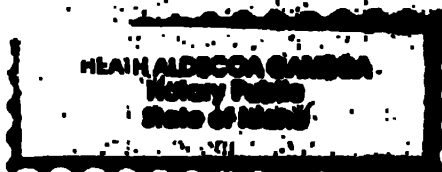
**MUR # 6086**

Re: Jim Risch for U.S. Senate Committee

According to the campaign reports filed by the Jim Risch for U.S. Senate Committee as required by the Federal Election Campaign Act, the office for Mr. Risch's campaign is located in the same office building as his law firm, Risch Goss Insinger Gustavel, 407 W. Jefferson St., Boise, Idaho 83702. The treasurer of the Jim Risch for U.S. Senate Committee is R. John Insinger, a named partner in Mr. Risch's law firm. The campaign manager for the Jim Risch for U.S. Senate Committee is the candidate's son, Jason Risch, also a lawyer in the Risch law firm.

Given these facts, questions arise whether the Jim Risch for U.S. Senate Committee's reports under the Federal Election Campaign Act accurately reflect the receipts and expenditures made by the Risch Committee. For example: Does the Risch Campaign occupy space clearly separated from the Risch law firm? Does any reimbursement for rent by the Risch Committee to the Risch law firm reflect the fair market value of the space? Do Jim Risch and/or his law partners benefit by the payment of rent to the Risch law firm? Do Jim Risch and/or his law partners own the building occupied by the Risch Committee and the Risch law firm? Does the Risch Committee allocate overhead such as support staff, telephones, office equipment, etc. between the campaign and the law firm? Does the failure to allocate such costs amount to campaign contributions to the Risch Committee? Are such contributions allocated among the law firm partners? Under previous opinions, the FEC has ruled that such receipts and expenditures including allocations must be made.

Therefore, the Idaho State Democratic Party, hereby requests that the Federal Election Commission undertake an investigation of the Jim Risch for U.S. Senate Committee based upon its information and belief that the reports filed by the Risch Committee with the FEC fail to comply fully with the provisions of the Federal Election Campaign Act as amended.



Sincerely,

*James D. Hansen*  
James D. Hansen  
Executive Director

my Commission Expires 5/12/2014

Subscribed and sworn to before me on this 22 day of Sept. 2008.

Paid for by Idaho State Democratic Central Committee

Remember to check your income tax form for "Tax Check-Off" for the Democratic Party. Thank you.

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